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November 20, 2002
Marlene Dortch
Secretary
Federal Communications Commission
445 12 St., S.W.
Washington, D.C. 20554

**Re: Ex Parte, Telecommunications Relay Services and Speech-to-Speech Services For
Individuals With Hearing And Speech Disabilities, CC Docket No. 98-67**

Dear Ms. Dortch:

Yesterday, Larry Fenster and Hadi Alsegaf from WorldCom met with Thomas Chandler, Cheryl King, and Janet Sievert of the Consumer and Governmental Affairs Bureau. We discussed issues related to the Petitions for Reconsideration filed in response to the Commission's April 22, 2002 Declaratory Ruling on IP-Relay. In particular, WorldCom stated that the Commission should permanently waive the requirements for IP-Relay providers to provide automatic 911 access, pay-per-call access, voice carryover (VCO), hearing carry over (HCO), and speech-to-speech service (STS) over IP-Relay. WorldCom reiterated its position that competition would compel providers of IP-Relay to provide these, and additional capabilities, as soon as they became feasible. To illustrate this point, we noted that WorldCom has recently begun to provide voice-initiated access to its IP-Relay service even though the Declaratory Ruling did not require this capability.

We stated our view that by limiting the HCO mandate to the text leg of such a call, the Declaratory Ruling intended IP-Relay providers to make 2-line, not single-line HCO available. We suggested the Commission clarify that this was its intent.

We also discussed steps WorldCom has taken to provide access to pay-per-call services. We explained that although we have provided this capability, demand has been extremely *de minimus*, and it has exposed us to a variety of unreimbursable expenses. We therefore recommended the Commission eliminate this requirement.

Finally, we recommended the Commission reimburse providers who have been offering all mandated IP-Relay services other than HCO and pay-per-call, from the date on which they began completing IP-Relay calls.

If you have any questions, please contact me at the telephone number above.

Sincerely,
Larry Fenster

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